



Department of Energy
Washington, DC 20585

September 11, 2026

Scott Osterholt, Managing Director Federal Grants and Broadband
American Electric Power
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Subject: U.S. Department of Energy, Office of Energy Dominance Financing,
Completion of Environmental Review for American Electric Power's
North McConnelsville to South Rokeby Transmission Line Rebuild
Project in Morgan County, Ohio

Dear Mr. Osterholt:

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF) has issued a Federal loan guarantee to American Electric Power (AEP) pursuant to DOE's authority under Title XVII of the Energy Policy Act of 2005, as amended. The loan guarantee to AEP is intended to provide financing for many projects over the life of the Federal loan guarantee. Each project is reviewed and considered individually prior to being approved for financing under the Federal loan guarantee. AEP has identified the North McConnelsville to South Rokeby Transmission Line Rebuild Project (Project) in Morgan County, Ohio.

The Project will rebuild approximately 0.23 mile of existing 69-kilovolt transmission line between the North McConnelsville Substation and the South Rokeby Switch in the location that it exists today. The rebuild will require the existing 50-foot-wide right-of-way (ROW) to be slightly expanded to a new width of 60 feet. A slight deviation is necessary to accommodate a new approach into the existing substation, but the transmission line centerline would remain with the existing ROW. A total of eight (8) existing 65-foot-tall wood structures will be removed and replaced with six (6) new approximately 80-foot-tall H-frame structures or galvanized steel poles, as well as new overhead conductors and shield wire. Access roads will consist of existing roads and temporary roads (i.e., temporary timber matting placed on the ground); no new access roads will be needed for construction. Work pads will be located primarily within the existing ROW, but may extend slightly beyond the ROW in some locations. All construction inside and outside of the existing ROW, including work pads and placement of temporary access roads, will occur in previously disturbed areas. No wetlands or surface waters will be impacted by the Project. The general construction process will entail erosion and sediment control installation, access road work, crane pad grading, removal of existing structures and conductors, foundation installation, structure assembly and erection, conductor/wire installation, and restoration once construction is completed.

Construction is anticipated to begin October 1, 2026, with Project operation by March 24, 2027.

EDF conducted the environmental reviews and consultations required by the applicable and relevant environmental statutes and Executive Orders (EOs) associated with its proposed Federal financial support. The applicable and relevant environmental statutes and EOs included:

1. Section 7 of the Endangered Species Act (16 USC 1536)
2. Section 106 of the National Historic Preservation Act (54 USC 306108)
 - a. EO 13175, Consultation and Coordination With Indian Tribal Governments

Applicable and Relevant Environmental Review(s)

Section 7, Endangered Species Act

On August 4, 2026, EDF obtained from the U.S. Fish and Wildlife Service (USFWS) an Official Species List (Project Code 2026-0090834), which resulted in the following species identified as occurring or potentially occurring in the Project area: the endangered Indiana bat; four endangered clams (fanshell, pink mucket, sheepsnose mussel, snuffbox mussel); three threatened clams (longsolid, rabbitsfoot, round hickorynut); the threatened American burying beetle, and the proposed threatened monarch butterfly. No critical habitat is designated or proposed in the Project area. EDF utilized the USFWS' American Burying Beetle Dkey in the USFWS' Information for Planning and Consultation (IPaC) website, and on August 4, 2026, obtained a *no effect* determination for the species. On August 5, 2026, EDF informally consulted with the USFWS and requested concurrence with EDF's *may affect, not likely to adversely affect* determinations for the Indiana bat. USFWS concurred with this determination on August 11, 2026, which included the following conservation measure that AEP must implement as part of the Project:

Trees $\geq$ 5 inches in diameter at breast height (dbh) must be trimmed or cleared between October 1 and March 31.

EDF made *no effect* determinations for the clam species because there would be no in-water work, and any potential indirect impacts (e.g., erosion and sedimentation) would be avoided due to AEP implementing a Stormwater Pollution Prevention Plan, which is required to be in place in order to obtain a National Pollutant Discharge Elimination general construction permit from Ohio Environmental Protection Agency to protect surface waters and wetlands, and water quality.

EDF has determined the Project would *not likely jeopardize the continued existence* of the proposed monarch butterfly. Construction of the rebuild would involve limited ground disturbance that would occur primarily within an already existing ROW or along the temporary access roads. Restoration of all temporarily disturbed areas with native seed mixes will minimize any impact. The USFWS concurred with this determination on August 4, 2026. In addition, EDF does not anticipate a USFWS decision on whether to formally list the monarch butterfly in the immediate future; as reflected in the Trump Administration's [Unified Agenda of Regulatory and Deregulatory Actions](#), the final listing determination for the species is included as a "long-term action."

Section 106, National Historic Preservation Act

In accordance with the National Historic Preservation Act (NHPA), EDF consulted with the Ohio State Historic Preservation Office (SHPO). On September 2, 2026, the Ohio SHPO concurred with EDF's finding of No Adverse Effect. EDF identified and contacted six (6) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Delaware Nation, Oklahoma; Delaware Tribe of Indians; Eastern Shawnee Tribe of Oklahoma; Miami Tribe of Oklahoma; The Osage Nation; and Seneca-Cayuga Nation. The Osage Nation responded and stated they do not anticipate the Project will adversely impact any cultural resources or human remains protected under NHPA, National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, or Osage law. No other comments were received from the remaining Tribes.

Conclusion

With this letter, EDF confirms that it has completed the environmental reviews and consultations required by the applicable and relevant environmental statutes and Executive Orders (EOs) associated with its proposed Federal financial support.

EDF notes that AEP is responsible for obtaining permits, approvals, and/or authorizations required for the construction and/or operation of the Project.

Respectfully,

Molly Cobbs
Environmental Project Manager
Office of Energy Dominance Financing

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